Illinois Environmental Protection Agency
Bureau of Water, Permit Section
(IEPA)

2520 West Iles, Post Office Box 19276, Springfield, Illinois 62794-9276, 217/782-3362

The IEPA has issued a Public Notice of a request for a Clean Water Act Section 401 water quality certification that would allow the issuance of a federal permit for the discharge of pollutants to waters of the State.

Public Notice Beginning Date:	**Public Notice Ending Date:**
Monday, January 12, 2026	Tuesday, February 10, 2026

Agency Log No.: C-0228-25

Federal Permit Information: Federal permit/license no. LRL-2025-00459 is under the jurisdiction of Louisville District, Regulatory Branch U.S. Army Corps of Engineers

Name and Address of Discharger: Corinth Treating Plant, LLC, Paul Corrigan - 1000 Noble Energy Drive, Suite 500, Canonsburg, PA 15317

Discharge Location: In Section 31 of Township 8-South and Range 5-East of the East 3rd Principal Meridian in Saline County. Additional project location information includes the following: Bushy Creek Church Road, Galatia, IL 62890

Name of Receiving Water: Unnamed Tributary to Brushy Creek, Brushy Creek

Project Name/Description: Keyrock Corinth Gathering System - Well Connect RLY - proposed installation of 0.4 miles of pipe in Brushy Township to service four additional proposed well location (proposed by others)

Construction Schedule: Beginning Nov 2025 and ending Apr 2026

The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters must provide their name and address along with comments on the certification request. The IEPA Log number must appear on each comment page. Commenters may include a request for public hearing. Only hearing requests and comments that pertain to Clean Water Act Section 401 authority will be considered. This authority provides consideration of whether the permit or license would be consistent with Sections 301, 302, 303, 306, or 307 of the CWA, as well as "any other appropriate requirement of State [or tribal] law". Requests for additional comment period must provide a demonstration of need. The final day of comment acceptance will be on the Public Notice Ending date shown above, unless the IEPA grants an extended notice period. The attached Fact Sheet provides a detailed description of the project and the findings of the IEPA's antidegradation assessment.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please see the contact information below.

Name: Oscar Zavala Email: oscar.zavala@illinois.gov Phone: 217/782-3362

Post Document. No. C-0228-25-01122026-PublicNoticeAndFactSheet.pdf

401 Water Quality Certification Fact Sheet for Keyrock Corinth Gathering System

IEPA Log No. C-0228-25

Contact: Angie Sutton 217-782-9864

Corinth Treating Plant, LLC. has applied for a 401 Water Quality Certification for impacts associated with installation of approximately 0.4 miles of 12-inch high-density polypropylene (HDPE) pipelines to service two proposed well locations. The pipelines consist of multiple 12-inch HDPE pipelines designed to collect and convey coalbed methane gas. The proposed project site is located in Section 31 of Township 8 South, Range 5 East, Saline County, IL.

The applicant provided the following information regarding the wells: "Since the two wells are proposed by others, information pertaining to timeline, site plans, or construction techniques have not been provided. It is assumed that construction of the proposed well locations occurs concurrently or following the completion of the gathering line. [one] well is located within the gathering line ROW and the other well is partially located within the ROW. All potential construction activities will occur in areas where no aquatic resources were identified, therefore no aquatic resources impacts are anticipated. Tree Clearing outside the gathering line ROW is assumed for one of the well locations."

The project will cross two intermittent streams, one perennial stream and one wetland. Brushy Creek (Stream 1-1) and two of its unnamed tributaries (Streams 1-3 and 1-4) will be temporarily impacted by the proposed action. In total, temporary stream impacts will total 130 linear feet (LF). Wetland 1-1 will undergo 1.11 acres (Ac) of conversion from a PFO (Palustrine Forested) to a PEM (Palustrine Emergent) wetland. There are no permanent stream impacts proposed. Construction will consist of using a permanent 30 foot wide right of way (ROW) and temporary workspaces 20-25 feet wide during construction. Crossings will be installed via open-cut excavation with a minimum of 48" of cover. Disturbed areas will be allowed to revegetate following construction and water/wetland resources will be restored to preconstruction contours.

The applicant is proposing to provide compensatory wetland mitigation for the unavoidable, forested wetland conversion impact through purchase of wetland credits from the Raccoon Creek Mitigation Bank.

Information used in this review was obtained from the application documents dated March 30, 2025, May 15, 2025, May 19, 2025, May 30, 2025, and December 10, 2025.

Identification and Characterization of the Affected Water Body.

A wetland delineation was conducted on the 47-acre study area, based on field investigations completed on January 28, 29, and 31, 2025. Six uplands (Uplands 1-1 through 1-6), seven wetlands (Wetlands 1-1 through 1-7), and six streams (Streams 1-1 through 1-6) were identified. The following features are the ones proposed to be impacted by the project.

Brushy Creek (Stream 1-1) has 0 cfs of flow during critical 7Q10 low-flow conditions. Brushy Creek is classified as General Use Water. Brushy Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*, nor is it given an integrity rating in that document. Brushy Creek (IL_ATGH-04), is listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for Aquatic Life Use with potential causes given as flow regime modification and habitat alterations. This segment of Brushy Creek is not subject to enhanced dissolved oxygen standards.

Approximately 355 LF of Brushy Creek was within the study area. Brushy Creek is a perennial stream flowing through the project area from west to east. It is 20 to 25 feet wide and is well defined, with a sandy gravel substrate and 8 to15-foot incised banks. Bankfull width of the stream is 50 to 70 feet, and fish were observed at the time of the field investigation. No permanent impacts are proposed; however, 50 LF are expected to be temporarily impacted as a result of the open-cut trenching, timber mat, and erosion control matting.

The unnamed tributaries to Brushy Creek (Streams 1-3 and 1-4) have 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributaries to Brushy Creek are classified as General Use Waters. The unnamed tributaries to Brushy Creek are not listed as a biologically significant streams in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*, nor are they given an integrity rating in that document. The unnamed tributaries to Brushy Creek (no segment codes), tributaries to Waterbody Segment IL_ATGH-04 are not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as they have not been assessed. These segments of the unnamed tributaries to Brushy Creek are not subject to enhanced dissolved oxygen standards.

Approximately 489 feet of Stream 1-3 was within the study area. Stream 1-3 is an intermittent stream flowing south to north across Wetland 1-1 and into Stream 1-4. It is 4 to 8 feet wide with a well-defined channel. Water depth was 6 to 20 inches, and it had a bankfull depth of 1 to 2 feet. No permanent impacts are proposed; however, 55 LF of the stream will be impacted by open-cut trenching, workspace, and timber mat bridge access.

Approximately 490 feet of Stream 1-4 was within the study area. Stream 1-4 is an intermittent stream flowing west to east across Wetland 1-1. The stream appears to be a man-made ditch with an 8- to 10-foot wide, well-defined channel. Water depth was 6 to 20 inches, and it had a bankfull depth of 8 to 10 feet. No permanent impacts are proposed; however, 25 LF of the stream will be impacted by placement of the timber mat bridge access.

Wetland 1-1 occupies 6.5 Ac within the study area and is delineated as "open". Its total size is unknown but extends well beyond the project area. 1.1 Ac of this forested wetland will be converted to emergent wetland for open cut trenching, placement of temporary timber mats for access, and other required workspace to safely and efficiently install the pipe. The proposed permanent impact is a result of conversion from tree clearing and maintenance of the permanent ROW as herbaceous wetland. Dominant vegetation identified during the field investigation include River Birch *(Betula nigra),* American Sycamore *(Platanus occidentalis),* and Green Ash *(Fraxinus pennsylvanica)*. The Floristic Quality Assessment (FQA) resulted in a Floristic Quality Index (FQI) of 14 for Wetland 1-1. An FQI of 1-19 indicates low vegetative quality, 20-35 indicates high vegetative quality and an FQI above 35 indicates "Natural Area" quality. The FQI for Wetland 1-1 indicates low vegetative quality , however the wetland exhibited a Native Mean C value of 7. A Native Mean C value of 3.5 or greater indicates a High-Quality Aquatic Resource (HQAR).

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

Due to implementation of perimeter erosion and sedimentation control utilization, sediment loaded water will not leave the construction area and impact water resources off-site. Additionally, a Stormwater Pollution Control Plan (SWPPP) will be implemented. Because of these measures, pollutant load increases in suspended solids during land grading and stockpiling activities will be

minimal during the project. Impacts to streams are proposed to be short-term and temporary and the potential loss of aquatic habitat, loss of aquatic function, permanent additions of pollutant parameters, or reduction of dissolved oxygen are not anticipated. The only potential increase in suspended solids from proposed activities are from removal of the temporary stream by-pass system where fine sediments may be temporarily suspended during re-initiation of flow through the project area. Overall, these impacts are anticipated to be short-term and have no adverse effect on overall water quality.

Fate and Effect of Parameters Proposed for Increased Loading.

Measures to minimize the potential impacts to the receiving waters include minimizing ground disturbing activities, staging materials away from wetlands and waterbodies, and implementing the Project Stormwater Pollution Control Plan (SWPPP), along with other, best management practices (BMPs). General pipeline construction procedures are outlined in detail and are included as part of the application documents.

No permanent wetland fill will occur as a result of this project. All temporary impacts will be the result of open-cut trenching, workspace, and timber mat bridge access. During tree removal, stumps will also be removed from the ROW and if they interfere with timber mat installation, the temporary workspaces. Sediment control devices will be installed prior to earthmoving activities and maintained throughout the duration of construction until permanent stabilization is complete. The proposed project will also implement other erosion and sedimentation best management

practices to reduce the risk of accelerated erosion that could negatively affect the form and function of water resources both within and in proximity to the proposed project area. Construction equipment operating in wetland areas would be limited to that needed to clear the right-of-way, dig the trenches, install the pipeline, backfill the trenches, and restore the right-of-way. At no time will equipment be permitted to access water resources without utilizing timber mats to avoid the potential for compaction of surface and sub-surface soils

Concerning the streams, best management practices are proposed to minimize the potential effect to receiving waters and include minimizing ground disturbing activities, staging materials away from streams, and installing and maintaining appropriate erosion and sediment controls. The proposed project will also implement other erosion and sedimentation best management practices to reduce the risk of faster erosion that could negatively affect the water resources within and in proximity to the proposed project area. Construction equipment will operate from the streambanks and will at no time be permitted to access the waterway. All crossing of the waterway

will be via a temporary timber mat bridge. In addition, trench plugs/trench breakers will be installed along the pipeline approximately 5 feet from the channel's top of bank to maintain subsurface hydrology. Stream crossings will be performed "in the dry" and proposed construction and pipeline installation activities will not commence if rainfall is forecast within 24-hours of the proposed start. Within perennial channels or during the wet season in intermittent channels, a temporary stream

bypass will be utilized to avoid sedimentation within the streams. Pumps will be sized appropriately to maintain normal flow conditions during the period at which construction occurs both upstream and downstream of the proposed crossings.

The applicant is proposing to provide compensatory wetland mitigation for the unavoidable, forested wetland conversion impact through purchase of forested wetland credits from the Raccoon Creek Mitigation Bank. Stream channel loss is not proposed; therefore there is no proposed stream mitigation.

Purpose and Social & Economic Benefits of the Proposed Activity.

The purpose of this project is to convey the captured coal bed methane for beneficial downstream uses (i.e., energy supply) as opposed to its unregulated release into the atmosphere. Additionally, the utilization of coal bed methane in energy generation displaces other more polluting fossil fuels, such as coal. Overall, the use of coalbed methane promotes the beneficial use of a substance that may otherwise degrade both the environment and local air quality conditions, providing benefits to both the local community and other downstream users.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

<u>No Action Alternative</u>

Pipeline construction would not occur with the No Action Alternative. There would be no impacts, but the project purpose and need would not be met. Consumers would be required to seek other sources of energy, which could include natural gas from other providers or other types of energy, including coal or oil. This would require other projects to be initiated and in turn, would result in their own set of unspecified impacts associated with the proposed project.

Proposed Project (Preferred Alternative)

The proposed project will achieve the purpose and need of the project while avoiding and minimizing wetland and stream impacts to the extent practicable. The alignment is proposed to be able to collect and convey the coalbed methane gas from the two proposed wells. The proposed well locations for the overall system are located where drilling can be utilized to access the subsurface mine tunnels associated with the reclaimed mine. The proposed pipeline location minimizes the distance between the proposed wells and the main gathering line connecting to each of the two wells. Alternative alignments are not feasible to connect to the proposed well locations without additional impacts to nearby environmental resources.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities.

An EcoCAT endangered species consultation was submitted on May 15, 2025 (Project #2513126) to the Illinois Department of Natural Resources for project area. An automatic termination was issued as the Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location.

A cultural survey report dated March 2025 states that "no cultural material or cultural features were identified in the project area during the present survey, and no archaeological sites were recorded. The entirely negative results of the present survey indicate that activities associated with the proposed undertaking will not have an adverse impact on significant cultural deposits within the project-corridor reroute."

A USFWS IPaC determination letter (Project Code 2025-0097131) dated May 15, 2025, identified the proposed project is within the range of two endangered species (Indiana Bat and Northern long-eared bat) and one proposed endangered species (Tricolored bat). The project is not anticipated to affect such species. The proposed project is not known to be located within 0.5 mile of a hibernaculum nor is a hibernaculum proposed or anticipated to be disturbed by the project. All tree-clearing will be performed November 1-March 31 to avoid potential impacts to bat species. Two other proposed species, (Whooping Crane *(Grus americana)* and Monarch Butterfly *(Danaus plexippus))* were identified as potentially inhabiting the proposed project area. While suitable habitat for these species may exist within or in proximity to the proposed project area, impacts to these species are not anticipated as a result of the proposed project.

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time this assessment was written. We tentatively find that the proposed activity would result in the attainment of water quality standards; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity would benefit the community by promoting the beneficial use of a substance that may otherwise degrade both the environment and local air quality conditions**.** Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.